

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
SHAI BEN-LEVY,

Plaintiff,

: Consol. Case No. 11-cv-1554 (KBF)

: - against -

BLOOMBERG, L.P.; and TONY TANG,
DOMENIC MAIDA and PRAMIT SHAH,
Individually and in their capacities as Managers
at Bloomberg, L.P.,

:
NOTICE OF DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT

: Oral Argument Requested

Defendants.

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PLEASE TAKE NOTICE that upon the annexed Rule 56.1 Statement, the Declaration of Thomas H. Golden, sworn to April 2, 2012, and the exhibits thereto, the Declaration of Shawn Edwards, sworn to April 2, 2012, and the exhibit thereto, the Declaration of Domenic Maida, sworn to April 2, 2012, the Declaration of Kenneth Cooper, sworn to March 30, 2012, the Declaration of Alison Trellis, sworn to April 2, 2012, the Declaration of Jamie Hartsell, sworn to April 2, 2012, and the accompanying Memorandum of Law, Defendants Bloomberg L.P., Tony Tang, Domenic Maida and Pramit Shah, by their attorneys Willkie Farr & Gallagher LLP, will move this Court, before the Honorable Katherine B. Forrest, United States District Judge, Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York for an Order granting summary judgment in favor of Defendants as to all of Plaintiff's claims in the Complaints pursuant to Rule 56 of the Federal Rules of Civil Procedure, and granting such additional relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order dated March 20, 2012, Plaintiff must serve answering papers, if any, by April 24, 2012, and Defendant shall serve any reply papers by May 11, 2012.

PLEASE TAKE FURTHER NOTICE that Defendants respectfully request oral argument if this motion is opposed.

Dated: April 2, 2012
New York, New York

WILLKIE FARR & GALLAGHER LLP

By: _____ /s/ _____

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